

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	Criminal No.16-55
v.)	
)	(18 U.S.C. 371)
SIMON T. TUSHA)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION TO CONTINUE SENTENCING PROCEEDING**

AND NOW COMES the United States of America by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania and James R. Wilson, Assistant United States Attorney in and for said district, and files the following Response to Defendant’s Motion to Continue Sentencing and in support thereof sets forth the following:

1. Sentencing in the above matter is currently set for January 3, 2019;
2. Defendant Tusha, at docket number 59 on December 12, 2018, filed a Motion to Continue the Sentencing to a date in March 2019;
3. The reason proposed for the requested sentencing was that the defendant had yet to complete his proposed cooperation with the authorities in the Netherlands regarding a matter that was being prosecuted there;
4. Unbeknownst to counsel for Mr. Tusha the matter being handled by authorities in the Netherlands has come to completion and there is no further need for any action by Mr. Tusha, nor is there any impediment to proceeding forward with the sentencing scheduled for January 3, 2019;
5. Inasmuch as the matter has been pending sentencing for nearly two years (the first request for a postponement was filed at Doc. No. 39 on December 30, 2016) the United States

respectfully requests that Defendant's Motion to Continue be denied and that the matter proceed to sentencing on January 3, 2019.

Respectfully Submitted,

SCOTT W. BRADY
United States Attorney

s/ James R. Wilson
JAMES R. WILSON
Assistant U.S. Attorney
PA ID No. 27648